



Modern Slavery Statement
March 2026

1. Introduction

Oakley Capital Investments Limited (“OCI” or the “Company”) is committed to acting responsibly and with integrity. The Company is committed to combatting modern slavery and human trafficking, to the extent that they may impact the Company’s business and or supply chain. As a listed investment firm, the Board recognises the importance of working with companies whose services the business engages, as well as those that the Company invests in, to encourage and support them to adopt responsible supply chain processes.

OCI is listed on the London Stock Exchange’s Main Market and is incorporated in Bermuda. It is therefore not within the scope of the UK Modern Slavery Act 2015 (“MSA”). Nevertheless, the Board’s commitment to combatting modern slavery and, as such, has determined it to be appropriate to produce this slavery and human trafficking statement on a voluntary basis with the MSA in mind.

This statement is made by the Company in relation to the financial year ended 31 December 2025.

2. Our organisation & policies

OCI is a listed private equity firm with six Directors and one employee, with its office at Wellesley House North, Ground Floor, The Waterfront, 90 Pitts Bay Road, Pembroke HM 08, Bermuda. OCI provides investors with the opportunity to invest in a diversified portfolio of fast-growing private businesses across the four defined investment strategies of the funds advised by Oakley Capital Limited (“Oakley”), the Investment Adviser, Operational and Administration Services provider to the Company, in addition to the venture capital funds advised by PROfounders Capital Partners LLP and Touring Capital LLC.

The Company’s Investment Adviser, Oakley, has been a signatory of the UN-supported Principles for Responsible Investment since 2016, and has in place several operational teams that together drive a robust environmental, social and governance (“ESG”) programme, which informs our business, policies and practices and supports our modern slavery programme and this statement.

Given the nature, size and scale of the Company’s business, the Board do not consider it necessary to put in place a specific Modern Slavery Policy. However, the Company’s primary service provider, Oakley, has in place policies on Modern Slavery, whistleblowing, equal opportunities, anti-discrimination and harassment, which supports the Company’s efforts to minimise its exposure to modern slavery. The Company relies on Oakley to ensure that due diligence is conducted on new and existing third-party suppliers, and that contractual terms addressing modern slavery risks are included within agreements where appropriate.

3. Due diligence & managing risk

As a financial services business with only one employee, our supply chain is short and comprises primarily business services, including professional advisors.

The Company does not consider that its contractual arrangements with Oakley or any other suppliers that provide the Company with professional advice give rise to material modern slavery risks. The primary modern slavery risk therefore relates to contractors appointed to provide Bermuda-based operational services such as facilities management, though the likelihood of such an appointment presenting a material modern slavery risk is also limited.

These risks are managed by working with Oakley and other suppliers with whom the Company has a long-standing relationship and consider to be reputable. Oakley has undertaken its own modern slavery assessment and demonstrates their commitment to the MSA through the MSA disclosure on their website [Modern Slavery Act statement | Oakley Capital](#).

4. Oakley funds’ portfolio companies

Oakley acts as the Investment Adviser to the Company, under a contractual arrangement between the parties.

Certain of the Oakley funds’ portfolio companies fall within threshold requirements for reporting under the MSA. As these companies are not part of either the Company’s or Oakley’s supply chain, it remains those

respective portfolio company's responsibility to comply with the MSA or equivalent jurisdiction legislation, where applicable.

The Company's Investment Adviser, Oakley, conducts extensive due diligence on target companies, and associated parties. Details of this process can be found in [Oakley's Modern Slavery Statement](#).

5. Training and awareness

The Company's Directors receive modern slavery and human trafficking training biennially, helping the Board to continue to be mindful of current and emerging modern slavery and human trafficking risks to the Company, its investments and its key service providers.

6. Ongoing steps

The Board recognises that monitoring the risks associated with modern slavery and human trafficking requires constant commitment and vigilance. Together with Oakley, the Company continues to identify opportunities to further reduce the risk of human trafficking and modern slavery, increase transparency in Oakley's operations and supply chains and respond effectively to new risks as they are identified. This statement will be reviewed in line with MSA requirements to assess material changes to our modern slavery risk profile, and updates to our supply chain that may necessitate updates to this statement.

7. Approval

This Modern Slavery Statement was approved by the Board, and signed by Steve Pearce, for and on behalf of the Board, on 10 March 2026.

Steve Pearce

Interim Chair, Oakley Capital Investments Limited